

1 **GREBEN & ASSOCIATES**

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10 Attorneys for Defendant RICHARD C. PETERS
11 and RAMONA W. PETERS, individually and as Trustee
12 of the PETERS FAMILY TRUST.

13 **UNITED STATES DISTRICT COURT**
14 **EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO DIVISION**

15 CALIFORNIA DEPARTMENT OF TOXIC
16 SUBSTANCES CONTROL,

17 Plaintiff,

18 vs.

19 PAYLESS CLEANERS, COLLEGE
20 CLEANERS, HEIDINGER CLEANERS,
21 NORGE VILLAGE CLEANERS, CAVA,
22 INC., a California corporation, LOBDELL
23 CLEANERS, CITY OF CHICO, NORVILLE
24 R. WEISS, JANET L. WEISS, PAUL
25 HEIDINGER, INEZ N. HEIDINGER, 5TH
26 AND IVY, a General Partnership, 427 IVY, a
27 Limited Partnership, RICHARD C. PETERS
28 and RAMONA W. PETERS, individually and
 as trustees of the Peters Family Trust,
 BETTY M. ROLLAG, RANDALL
 ROLLAG, and TAMI ROLLAG,

29 Defendants

30 RICHARD AND RAMONA PETERS,
31 Individually and as co-trustees of the Peters
32 Family Trust,

33 Third Party Plaintiffs

34 vs.

35 NORGE DIVISION OF BORG-WARNER
36 CORPORATION, ET. AL.

37 Third Party Defendants.

38 Case No. CIVS-02-2389 LKK DAD

39 *ASSIGNED TO*
40 *HON. LAWRENCE K. KARLTON*
41 *COURTROOM 4*

42 COMPLAINT FILED: 10/31/02
43 TRIAL DATE: 07/22/08

44 **STIPULATION AND ORDER**
45 **EXTENDING DATES**

1 IT IS HEREBY STIPULATED by and between all counsel that the following current dates be
2 extended as follows:

- 3 1. The date to disclose expert witnesses and produce expert reports in this case be
4 extended to December 17, 2007. The current date for disclosure is October 17,
5 2007.
- 6 2. The date to complete discovery in this case be extended to February 18, 2008.
7 The current date for completion is December 17, 2007.
- 8 3. The date for Law & Motion cutoff in this case be extended to April 15, 2008. The
9 current cutoff date is February 15, 2008.
- 10 4. The date for the Pretrial Conference in this case be extended to June 16, 2008 at
11 2:00 p.m. The current pretrial conference date is April 21, 2008 at 2:00 p.m.
- 12 5. The date for Trial in this case be extended to September 23, 2008 at 10:30 a.m.
13 The current trial date is July 22, 2008 10:30 a.m.

14 Alternatively, should the Court not wish to extend all deadlines, the parties respectfully
15 request that the expert disclosure/expert report disclosure date be extended to November 16,
16 2007.

17 The parties reach this stipulation because some of the remaining parties have reached
18 settlements in principle that are currently being documented. The parties request a modification
19 to the schedule so that the settling defendants are not burdened with participating in discovery
20 and expert disclosures prior to the time the Court can consider the motion to approve the
21 settlements

22
23 Dated: 9/21/07

GREBEN & ASSOCIATES

24
25 /s/ Jan A. Greben
26 JAN A. GREBEN
27 JENNA L. MOTOLA
28 Attorneys for Defendant RICHARD C. PETERS and
RAMONA W. PETERS, individually and as Trustees of
the PETERS FAMILY TRUST.

1 Dated:

SEDGWICK, DETERT, MORAN & ARNOLD, LLP

4 RICHARD A. CRITES
5 Attorney for Third Party Defendant FEDDERS
6 CORPORATION.
7

8 Dated: 9/20/07

GOLDSBERRY, FREEMAN & GUZMAN, LLP

10 /s/ Francis M. Goldsberry, II

11 FRANCIS MALCOLM GOLDSBERRY, II.
12 Attorney for Defendant CITY OF CHICO.
13

14 Dated: 9/19/07

FARELLA BRAUN & MARTEL LLP

16 /s/ Mathew J. Swain

17 JAMES H. COLOPY
18 MATHEW J. SWAIN
19 Attorney for Defendant 5th AND IVY, A General
20 Partnership, and Defendant 427 IVY, a Limited
21 Partnership.
22

23 Dated: 9/20/07

JERRY BROWN
24 Attorney General of California
25 THEODORA BERGER
26 Senior Assistant Attorney General
27

28 /s/ Timothy Sullivan

29 TIMOTHY SULLIVAN, Deputy Attorney General
30 Attorney for Plaintiffs CALIFORNIA DEPARTMENT OF
31 TOXIC SUBSTANCES CONTROL.
32

1 Dated: 9/19/07

HOLLAND & KNIGHT

3 /s/ Christopher W. Angius

4 CHRISTOPHER W. ANGIUS
5 Attorney for Third Party Defendant MAYTAG
6 CORPORATION.

7
8 **IT IS SO ORDERED**

9
10 Dated: September 25, 2007.

11
12 
13 LAWRENCE K. KARLTON
14 SENIOR JUDGE
15 UNITED STATES DISTRICT COURT